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July 18, 2011

Honorable Claire C. Cecchi,  
United States District Judge  
United States District Court  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *David Anderson v. Pertti Törmälä, et al.*, No. 11-cv-00525**

Dear Judge Cecchi:

Our firm represents the plaintiff in the above-referenced action. We are regrettably forced to write in response to defense counsel's July 15, 2011 letter to Your Honor.

The defendants' July 15, 2011 letter purports to justify the thirteen-page Jokela Declaration that was improperly submitted for the first time with the defendants' reply papers supporting their motion to dismiss. Notwithstanding the fact that the defendants' July 15, 2011 submission constitutes an impermissible sur-reply in further support of their motion, we will not address the merits of their submission; instead, the plaintiff hereby respectfully requests that if Your Honor were so inclined as to credit in any respect the Jokela Declaration and the myriad new issues it purports to raise, then the plaintiff should be permitted to submit a short rebuttal to refute the many unfounded assertions therein.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "S. Hecht".

Steven M. Hecht

cc: George O. Richardson, III, Esq.  
Carl D. Poplar, Esq.